

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE D.C. CIRCUIT**

Ruby Freeman, Wandrea' Moss,

*Plaintiffs-Appellees,*

v.

Rudolph W. Giuliani,

*Defendant-Appellant.*

No. 24-7021

**JOINT MOTION TO UTILIZE DEFERRED APPENDIX**

Pursuant to Federal Rules of Appellate Procedure 27 and Circuit Rule 30(c), the parties jointly move to amend the briefing schedule so as to utilize a deferred appendix in this matter. In order to maintain the expedited schedule of this appeal, the parties jointly request that the deadline for Appellant to file the deferred appendix be November 25, 2024, the same date that the reply brief is due. Further, the parties jointly request that the deadline for all final briefs be November 27, 2024. As amended, the briefing schedule would be as follows:

Appellant's Brief: October 2, 2024

Appellees' Brief: November 4, 2024

Reply Brief: November 25, 2024

Deferred Appendix November 25, 2024

Final Briefs November 27, 2024

Pursuant to Circuit Rule 30(c), all parties consent to this request.

September 18, 2024

Respectfully submitted,

s/ Aaron E. Nathan

Michael J. Gottlieb  
Meryl C. Governski  
Willkie Farr & Gallagher LLP  
1875 K Street NW  
Washington, DC 20006  
(202) 303-1442  
[mgottlieb@willkie.com](mailto:mgottlieb@willkie.com)  
[mgovernski@willkie.com](mailto:mgovernski@willkie.com)

Aaron E. Nathan  
Willkie Farr & Gallagher LLP  
787 Seventh Avenue  
New York, NY 10019  
(212) 728-8904  
[anathan@willkie.com](mailto:anathan@willkie.com)

*Counsel for Appellees*

s/ Kenneth A. Caruso

Kenneth A. Caruso  
Kenneth Caruso Law LLC  
15 West 72nd Street  
New York, NY 10022  
(646) 599-4970  
[ken.caruso@kennethcarusolaw.com](mailto:ken.caruso@kennethcarusolaw.com)

s/ David Labkowski

David Labkowski  
250 95th Street, Unit #547233  
Surfside, FL 33154  
(786) 461-1340  
[david@labkowskilaw.com](mailto:david@labkowskilaw.com)

*Counsel for Appellant*

**CERTIFICATE OF COMPLIANCE**

I certify that the foregoing motion complies with the typeface and style requirements of Federal Rule of Appellate Procedure 27(d)(1)(E), and the word limit of Federal Rule of Appellate Procedure 27(d)(2)(A), because the motion was prepared in double-spaced, 14-point Times New Roman font, and contains 131 words as determined by the word-count function of Microsoft Word.

s/ Aaron E. Nathan

**CERTIFICATE OF SERVICE**

I certify that the foregoing motion was served on all parties through the Court's CM/ECF system.

s/ Aaron E. Nathan